



Decision _____

FILED
8-26-16
02:05 PM

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of Southern California Gas Company (U904G) For Approval of The Branch Office Optimization Process.

Application 13-09-010
(Filed September 16, 2013)

INTERVENOR COMPENSATION CLAIM OF THE UTILITY REFORM NETWORK AND DECISION ON INTERVENOR COMPENSATION CLAIM OF THE UTILITY REFORM NETWORK

NOTE: After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD, supporting EXCEL Timesheets, and any other supporting documents to the Intervenor Compensation Program Coordinator at Icompcoordinator@cpuc.ca.gov.

Intervenor: The Utility Reform Network (TURN)	For contribution to Decision (D.) 16-06-046
Claimed: \$63,362.54	Awarded: \$
Assigned Commissioner: Carla J. Peterman	Assigned ALJ: W. Anthony Colbert
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
Signature:	/S/
Date: 8/26/16	Printed Name: Hayley Goodson, Staff Attorney

PART I: PROCEDURAL ISSUES (to be completed by Intervenor except where indicated)

A. Brief description of Decision:	In D.16-04-046, <i>Decision Granting, in Part, and Denying in Part, Southern California Gas Company's Request for Permission to Close Six Branch Offices</i> , the Commission addressed the application of Southern California Gas Company (SoCalGas) for approval of The Branch Office Optimization Process, as well as authorization to close six of its 47 branch offices now and permission to seek future closures through a Tier 2 Advice Letter process rather than an application. The decision grants SoCalGas's request to close the Bellflower, Monrovia, and Santa Monica branch offices, and denies its request to close the Santa Barbara and San Luis Obispo branch offices. The decision grants the request to close the Palm Springs branch office pending SoCalGas's successful implementation of a process for identification verification consistent with the Fair & Accurate Credit Transaction Act (FACTA) requirements that does not require customers to appear in-person or fax documents to the utility. The decision additionally clarifies that approval of the closure of certain branch offices does not mean that the Branch Office Optimization Process necessarily demonstrates that particular offices should be closed, since that process does not produce sufficient information regarding specific customer needs and preferences. Finally, because SoCalGas withdrew its request to seek future closures by Advice Letter, the Commission did not need to reach that issue.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	December 3, 2013	
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	December 20, 2013	
4. Was the NOI timely filed?		

Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	A.12-11-009	
6. Date of ALJ ruling:	Sept. 6, 2013	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	A.12-11-009	
10. Date of ALJ ruling:	Sept. 6, 2013	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.16-06-046	
14. Date of issuance of Final Order or Decision:	June 27, 2016	
15. File date of compensation request:	August 26, 2016	
16. Was the request for compensation timely?		

C. Additional Comments on Part I (use line reference # as appropriate):

#	Intervenor’s Comment(s)	CPUC Discussion

PART II: SUBSTANTIAL CONTRIBUTION (to be completed by Intervenor except where indicated)

A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059). (For each contribution, support with specific reference to the record.)

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<u>SoCalGas’s Proposed Branch Office Optimization Process (BOOP)</u> In D.16-06-046, the Commission agreed with TURN that SoCalGas’s proposed BOOP	<ul style="list-style-type: none"> D.16-06-046, pp. 49-50 TURN Opening Brief, pp. 8-20 	

<p>should not create a presumption that particular branch offices should be closed. The Commission’s reasoning followed TURN’s. The Commission noted that the BOOP “does not produce sufficient information regarding specific customer needs and preferences” and does not consider the proximity of the nearest branch office, which should be considered “until there is a clear demonstration by SoCalGas that there is no possible need for customers to visit a branch office.” TURN criticized the BOOP failing “to consider the needs, preferences, and convenience of those customers who actually use the branch offices,” and for only considering the proximity of Alternative Payment Locations (APLs), when APLs are not a substitute for branch offices (only branch offices offer the opportunity for in-person non-payment transactions).</p> <p>The Commission also took issue with the relative nature of the BOOP’s transaction reviews and screens, and required SoCalGas to focus on absolute metrics in evaluating transaction level changes, area income, and the percentage of CARE, disabled, or senior customers served by each branch office, citing the critique of TURN (which was also presented by other parties).</p>		
<p><u>SoCalGas’s Proposal to Close Six Branch Offices</u></p> <p>TURN opposed SoCalGas’s</p>	<p><u>Consideration of Nearest Branch Office</u></p> <ul style="list-style-type: none"> • D.16-06-046, pp. 43-44 	

<p>proposal to close all six of the branch offices at issue here, citing concerns about impacts on low-income, elderly, and disabled customers, lack of information in the record about why customers use the branch offices for payment and/or nonpayment transactions, the availability of reasonably comparable alternatives, specifically for non-payment transactions, distances and transit accessibility of alternative branch offices, and declining call center service levels. While the Commission in D.16-06-046 concluded that SoCalGas should be permitted to close three of the six, the Commission embraced several aspects of TURN’s analysis in its deliberations, including but not necessarily limited to the following.</p> <p>1. Consideration of Nearest Branch Office</p> <p>First, the Commission considered the distance to the nearest branch office as a critical element in considering whether to permit closure, consistent with TURN’s showing on the continued necessity of branch offices in assisting certain customers with FACTA identity verification. The Commission denied closure of the Santa Monica and San Luis Obispo offices, citing the distance to the nearest branch office (38 and 30 miles, respectively), and permitted closure of the Palm Springs branch office, the next farthest of the six from another branch office, only after SoCalGas demonstrated that customers no longer needed to</p>	<p>(denying closure of San Luis Obispo and Santa Barbara because of the distance to the nearest branch office); p. 45 (“Going forward, we are concerned that should SoCalGas request authority to close additional branch offices, customers may be asked to travel even farther distances to conduct the occasional in-person transaction.”); Finding of Fact 17 (“The need for some degree of in-person contact with a SoCalGas customer service representative remains, particularly where FACTA requirements continue [to] require identity verification that cannot always be performance online or over the telephone.”).</p> <ul style="list-style-type: none"> • Ex. TURN-4, Testimony of Hayley Goodson and Gayatri M. Schilberg on Behalf of TURN and CforAT, pp. 12-13 (establishing the need for branch office visits in some circumstances); pp. 6-8 (critiquing SoCalGas’s focus on APLs, when they cannot serve as substitutes for branch offices). • TURN/CforAT Opening Brief, pp. 28, 31 (pointing to the distance from the San Luis Obispo and Santa Barbara branch offices – 30 and 38 miles, respectively -- as heavily weighing against their closure); p. 33, fn. 133 (pointing to the 21-mile distance from the Palm Springs office to the nearest one). 	
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<p>visit branch offices to address FACTA compliance.</p> <p>2. Importance of Customer Needs and Preferences</p> <p>The Commission agreed with TURN that the preferences of the specific customers who use the branch offices must be taken into account in considering closure. The lack of this information prevented the Commission from authorizing the closure of more of the six offices.</p> <p>3. Conditional Authorization of Palm Springs Branch Office</p> <p>The Commission concluded that SoCalGas should be able to close the Palm Springs branch office, given the proximity of another branch office within 21 miles, but not until it satisfactorily implemented an alternative method of identity verification such that no customer would need to visit a branch office for FACTA compliance. The Commission pointed to the high number of service order transactions at that office. While TURN opposed closure, the Commission recognized the importance of addressing the need for FACTA-related visits to the branch office before permitting closure, as urged by TURN.</p> <p>The Commission also agreed with TURN that SoCalGas's supplemental testimony, presented after the issuance of the original proposed decision in December 2015, did not establish</p>	<p><u>Importance of Customer Needs and Preferences</u></p> <ul style="list-style-type: none"> • D.16-06-046, pp. 39-40 ([W]e cannot ignore the fact that the record shows that some customers still prefer to use the branch offices for transactions, the majority of which are payment transactions. Neither the transaction data nor the Branch Office Survey indicate with any degree of reliability the reason these customers prefer the branch offices. ... Without more customer-specific data, we are reluctant to permit SoCalGas to close all of the branch offices requested.”). • Ex. TURN-4, Testimony of Hayley Goodson and Gayatri M. Schilberg on Behalf of TURN and CforAT, pp. 16-17. • TURN/CforAT Opening Brief, pp. 8-11; pp. 27-38 (analyzing the specific proposed closures and discussing what little is known about customer preferences, other than their satisfaction with the branch offices). <p><u>Conditional Authorization of Palm Springs Branch Office Closure</u></p> <ul style="list-style-type: none"> • D.16-06-046, Finding of Fact 11, 12 (discussing the 21-mile distance to the next branch office from Palm Springs and that Palm Springs had the highest level of service order transactions among the six branch offices); Conclusions of 	
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<p>that SoCalGas had met the condition set forth in that PD for closure of the Palm Springs branch office. As such, the Commission retained the conditional approval and associated requirements for SoCalGas to demonstrate eligibility to close that office in the future.</p>	<p>Law 2, 3 (conditionally authorizing closure); pp. 50-53 (addressing SoCalGas's supplemental testimony on FACTA compliance options).</p> <ul style="list-style-type: none"> • TURN/CforAT Opening Brief, p. 33 (discussing the continued high volume of non-payment transactions at the Palm Springs Branch Office as weighing against closure). • TURN/CforAT Comments on the Supplemental Testimony of SoCalGas, pp. 3-7. 	
<p><u>Showing Required for Future Requests by SoCalGas to Close Branch Offices</u></p> <p>1. Advice Letter vs. Application</p> <p>SoCalGas originally requested Commission authorization to permit it to utilize a Tier 2 Advice Letter process, in combination with its proposed BOOP, for any future requests to close branch offices. TURN vehemently objected to this approach as inappropriate given the purpose of the Advice Letter process, the limited opportunity for review, and the informal and thus far-less transparent nature of that process relative to a formal Commission proceeding. As D.16-06-046 explains, SoCalGas withdrew its request in response to intervenor testimony.</p> <p>2. Contents of Showing</p>	<p><u>Advice Letter Process</u></p> <ul style="list-style-type: none"> • D.16-06-046, pp. 20, 49 • Ex. TURN-04, Testimony of Hayley Goodson and Gayatri M. Schilberg on Behalf of TURN and CforAT, pp. 22-23 • TURN Protest, pp. 6-8 <p><u>Showing Required</u></p> <ul style="list-style-type: none"> • D.16-06-046, Ordering Paragraphs 9, 10, 11, 12. • Ex. TURN-04, Testimony of Hayley Goodson and Gayatri M. Schilberg on Behalf of TURN and CforAT, pp. 23-24. • TURN/CforAT Opening Brief, pp. 43-45. 	

<p>Additionally, the Commission in D.16-06-046 adopted a number of TURN's recommendations regarding the showing SoCalGas should make in future requests to close branch offices. The Commission required SoCalGas to include the following information:</p> <ul style="list-style-type: none">• A survey of the customers who use the branch offices to determine their number and reasons why they use the branch offices. (OP 12)• A study of the impacts to low-income, elderly, and disabled customers of proposed closures. (OP 11)• Data on alternative payment and service order transaction channels used by customers formerly served by closed branch offices, including APL transaction volumes and level of service performance of the IVRU, contact center, and My Account, before and after closures. (OP 9)• Identification of performance standards and actual performance metrics for the Customer Contact Center, and complaints associated with all customer service channels. (OP 10) <p>TURN similarly advocated that SoCalGas be required to provide the following information, in addition to data previously required by the Commission on transaction trends:</p> <ul style="list-style-type: none">• An analysis of why customers use the branch office for		
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<p>payment and/or non-payment transactions;</p> <ul style="list-style-type: none"> Any analysis of the impacts of any proposed office closure on customers who are low-income, elderly, and/or have disabilities. A report on Call Center customer service levels, including utility targets and performance for all of the metrics typically addressed in general rate cases or PBR proceedings, such as average speed of answer, average handle time, CSR level of service, average level of service, level of busies encountered, etc. 		
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?¹	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: The Office of Ratepayer Advocates (ORA), The Center for Accessible Technology (CforAT), the Greenlining Institute (Greenlining), and the Utility Workers Union of America (UWUA)		
d. Intervenor's claim of non-duplication: TURN coordinated as closely as possible with the other intervenors in this proceeding, all of whom had positions similar to TURN's (albeit to varying degrees). TURN communicated regularly with ORA, UWUA, CforAT, and Greenlining, sharing discovery, discussing policy positions and strategy, and looking for formal opportunities to coordinate our showings on issues of		

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

<p>common interest.</p> <p>As a result of initial efforts at coordination, TURN and CforAT jointly sponsored direct testimony prepared by TURN witnesses Gayatri Schilberg and Hayley Goodson (Ex. TURN-4), and TURN joined CforAT in sponsoring part of the reply testimony of CforAT witness Dmitri Belser (Ex. CforAT-01). TURN and CforAT additionally coordinated our cross-examination during hearings, and filed all post-hearing pleadings jointly, including our opening brief, reply brief, response to SoCalGas's motion to supplement the record, and comments on SoCalGas's supplement testimony. This close coordination ensured no undue duplication between TURN and CforAT, and offered substantial efficiencies for both parties.</p> <p>While ORA was also a party, it did not make sense for TURN and ORA to coordinate in the same way as TURN did with CforAT because TURN and ORA reached different conclusions regarding the best outcomes for customers regarding some of the branch offices. Likewise, while TURN and UWUA both determined that all six branch offices should remain open, TURN and UWUA presented different theories and analyses supporting our recommendations. Finally, Greenlining, addressed a narrower set of issues than TURN, and did not file briefs. TURN submits that our showing was complementary with Greenlining's on the issues both organizations addressed, including SoCalGas's proposed Branch Office Optimization Process, and the proximity and convenience of alternatives to the branch offices proposed for closure for payment transactions.</p> <p>For these reasons, TURN submits that we avoided undue duplication in our participation in this proceeding and complemented the efforts of other parties, where feasible.</p>	
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C. Additional Comments on Part II (use line reference # or letter as appropriate):

#	Intervenor's Comment	CPUC Discussion

PART III: REASONABLENESS OF REQUESTED COMPENSATION (to be completed by Intervenor except where indicated)

A. General Claim of Reasonableness (§ 1801 and § 1806):

a. Intervenor's claim of cost reasonableness:	CPUC Discussion
As demonstrated in the Substantial Contribution section above, TURN's	

<p>participation led to meaningful benefits for residential ratepayers. TURN, along with other intervenors, helped to prevent the closure of the San Luis Obispo and Santa Barbara branch offices, and delayed the closure of the Palm Springs branch office (until SoCalGas meets the conditions set by the Commission), thus allowing these branch offices to continue serving customers whose needs and preferences are best served by this channel. As the Commission has previously noted, those customers tend to be the most vulnerable, including low income customers, elderly customers, and customers with disabilities. Furthermore, TURN helped to ensure that the Commission will have the information it needs to carefully and thoughtfully review any future requests by SoCalGas to close branch offices, and to do so in a formal proceeding, which affords the public and parties appropriate transparency and due process, in contrast to the expedited, informal vehicle proposed by SoCalGas.</p> <p>Taken together, the benefits obtained by TURN far exceed the cost of TURN's participation in this proceeding, which was less than \$65,000. TURN's claim should be found to be reasonable.</p> <p>As such, the Commission should find that TURN's efforts have been productive.</p>	
<p>b. Reasonableness of hours and direct expenses claimed:</p> <p>TURN assigned this proceeding to staff attorney Hayley Goodson. Ms. Goodson represented TURN in two prior proceedings wherein a utility had proposed to close local customer service offices. Because of her familiarity with the subject matter at hand, she was particularly well-suited to efficiently cover this proceeding. Ms. Goodson devoted approximately 155 hours to this proceeding (excluding time preparing this request), which equates to less than four weeks of full-time work.</p> <p>Ms. Goodson enlisted the assistance of Gayatri Schilberg of JBS Energy in reviewing SoCalGas's application, conducting discovery and analysis, preparing testimony, and supporting TURN during evidentiary hearings. Like Ms. Goodson, Ms. Schilberg had significant prior experience addressing local office closure issues before the Commission. Ms. Goodson and Ms. Schilberg jointly drafted and sponsored testimony on behalf of TURN (and CforAT). Ms. Schilberg devoted approximately 35 hours of time to assisting TURN in this proceeding, which equates to less than 1 week of full-time work.</p> <p>TURN also partnered with CforAT in preparing four documents filed after hearings. TURN and CforAT jointly prepared opening and reply briefs. Ms. Goodson and CforAT attorney Melissa Kasnitz each wrote portions of</p>	

both briefs, thus substantially reducing the time each would otherwise have devoted to brief writing. TURN later took the lead on drafting both parties' joint response to SoCalGas's motion to supplement the record and related comments on the SoCalGas supplemental testimony, substantially reducing the time CforAT needed to devote to those filings. TURN's timesheets reflect the benefits of the shared workload associated with briefing, as well as TURN's leading role on the latter two filings.

Given TURN's substantial contributions in this proceeding, the Commission should find that the number of hours claimed by TURN is reasonable.

Should the Commission believe that more information is needed or that a different approach to discussing the reasonableness of the requested hours is warranted here, TURN requests the opportunity to supplement this section of the request.

c. Allocation of hours by issue:

TURN has allocated all of our attorney and consultant time by issue area or activity, as is evident on our attached timesheets (Attachment 2) and in Attachment 4, which shows the allocation of TURN's time included in this request by attorney or expert and issue / activity area. The following codes relate to specific substantive issue and activity areas addressed by TURN.

Code	Description	Allocation of Time	<i>with "#" allocated</i>
#	The work in in this category was substantive in nature but not specific to any one issue area addressed by TURN. Work given this code can be approximately allocated across the other substantive issue areas as follows: 50% to Close, 40% to BOOP, and 10% to Future.	35.9%	
BOOP	This work was related to evaluating SCG's proposed Branch Office Optimization Process.	8.2%	22.6%
Close	This work was related to evaluating SCG's proposal to close 6 branch offices, including customer impacts and related cost issues.	25.6%	43.6%
Comp	Intervenor Compensation: work preparing TURN's NOI and Request for Compensation	6.0%	6.0%

Future	This work was related to the showing SCG should present in future requests to close branch offices, as well as the procedural vehicle for any such future requests.	0.1%	3.7%
GH	The work in this category was related to participation in hearings.	5.6%	5.6%
GP	The work in this category includes activities associated with general participation in this proceeding, such as TURN's initial review of the applications, reading ALJ procedural rulings, and reading parties' pleadings as necessary to determine whether TURN should address the issues raised.	15.7%	15.7%
PD	This work was related to the Proposed Decision which preceded D.16-06-046, where such work was not readily allocated to a specific issue code.	4.0%	4.0%
Sett	The work in this category related to settlement negotiations.	4.3%	4.3%
TOTAL		100%	100%
If the Commission believes that a different approach to issue-specific allocation is warranted here, TURN requests the opportunity to supplement this section of the request.			

B. Specific Claim:

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Hayley Goodson, TURN Attorney	2013	22.75	\$345	D.15-05-019; D.15-08-023	\$7,848.75			
Hayley Goodson, TURN Attorney	2014	114.50	\$355	D.15-08-023	\$40,647.50			
Hayley Goodson, TURN Attorney	2015	6.50	\$355	D.15-08-023 (adopting 2014 rate of \$355), adjusted by the 2015 0% COLA per Res. ALJ-308	\$2,307.50			
Hayley	2016	8.25	\$355	Apply 2015	\$2,928.75			

Goodson, TURN Attorney				requested rate of \$355; do not adopt as 2016 rate							
Thomas J. Long, TURN Legal Director	2013	0.25	\$555	D.14-05-015	\$138.75						
Robert Finkelstein, TURN General Counsel	2014	0.25	\$505	D.15-08-023	\$126.25						
Gayatri Schilberg, JBS Energy, Inc.	2014	32.84	\$215	D.15-08-023	\$7,060.60						
Subtotal: \$61,058.10						Subtotal: \$					
OTHER FEES											
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):											
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$			
Subtotal: \$						Subtotal: \$					
INTERVENOR COMPENSATION CLAIM PREPARATION **											
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$			
Hayley Goodson, TURN Attorney	2013	1.00	\$172.50	1/2 of requested hourly rate for 2013	\$172.50						
Hayley Goodson, TURN Attorney	2016	10.75	\$177.50	1/2 of requested hourly rate for 2015 (to be applied in 2016 for this comp request)	\$1,908.13						
Subtotal: \$2,080.63						Subtotal: \$					
COSTS											
#	Item	Detail			Amount	Amount					
	Lexis Legal Research	legal research associated with A.13-09-010			\$107.04						
	Phone	phone/fax expense associated with A.13-09-010			\$9.82						
	Photocopying	copying expense associated with pleadings in A.13-09-010			\$93.00						
	Postage	cost to mail pleadings related to A.13-09-010			\$13.95						
TOTAL REQUEST: \$63,362.54						TOTAL AWARD: \$					

<p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate</p>			
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR²	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Hayley Goodson	December 2003	228535	No
Thomas Long	December 1986	124775	No
Robert Finkelstein	June 1990	146391	No

C. Attachments Documenting Specific Claim and Comments on Part III (Intervenor completes; attachments not attached to final Decision):

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Timesheets for TURN's Attorney and Experts
Attachment 3	TURN Direct Expenses Associated with D.16-06-046
Attachment 4	TURN Hours Allocated by Issue
Comment 1	<p>2016 Hourly Rate for TURN Attorney Hayley Goodson</p> <p>Given the relatively small number of hours incurred by Ms. Goodson in 2016 related to D.16-06-046, TURN seeks only the hourly rate requested for 2015 (\$355) for these hours. TURN asks that the Commission NOT treat the decision on this compensation request as setting a 2016 hourly rate for Ms. Goodson, as TURN will seek and justify an actual 2016 hourly rate for her in a future compensation request.</p>

D. CPUC Disallowances and Adjustments (CPUC completes):

Item	Reason

² This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

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PART IV: OPPOSITIONS AND COMMENTS

Within 30 days after service of this Claim, Commission Staff
or any other party may file a response to the Claim (*see* § 1804(c))

(CPUC completes the remainder of this form)

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	
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If not:

Party	Comment	CPUC Discussion

FINDINGS OF FACT

1. Intervenor [has/has not] made a substantial contribution to D._____.
2. The requested hourly rates for Intervenor's representatives [,as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [,as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$_____.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Intervenor is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay Intervenor the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay Intervenor their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated.”] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of Intervenor’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

Revised September 2014

Attachment 1

Certificate of Service

(Filed electronically as a separate document pursuant to Rule 1.13(b)(iii))

(Served electronically as a separate document pursuant to Rule 1.10(c))

Revised September 2014

Attachment 2

Attorney Time Sheet Detail

TURN Hours Associated with A.13-09-010

Date	Atty	Task	Description	Time Spent	Year
5/22/14	BF	GH	SCG Office Closure case -- discuss developments, protocols w/ HGoodson	0.25	2014
	BF Total			0.25	
9/17/13	HG	GP	call fm M. Kasnitz/CforAT re SoCalGas' application	0.25	2013
9/18/13	HG	GP	begin reading application, testimony	0.50	2013
9/24/13	HG	Close	review materials from SoCalGas; draft memo to Mark, Ana, asking for assistance with evaluating the convenience of the APLs in each city with a branch office proposed for closure	0.75	2013
10/6/13	HG	GP	cont. reading app, testimony in prep for mtg tomorrow at SoCalGas	1.50	2013
10/7/13	HG	GP	cont. prep for today's mtgs, including reviewing discovery	1.25	2013
10/7/13	HG	GP	attend mtg w/ SoCalGas	2.00	2013
10/16/13	HG	GP	review protest filed early by UWUA; discuss data, policy issues, and TURN approach with M. Toney	0.75	2013
10/16/13	HG	GP	discuss TURN's protest, potential for coordination with GL, CforAT	0.50	2013
10/16/13	HG	GP	rsch, draft notes for protest	0.50	2013
10/18/13	HG	GP	skim Greenlining/CforAT protest	0.25	2013
10/18/13	HG	GP	draft protest	4.50	2013
10/21/13	HG	GP	read DRA's protest	0.25	2013
10/30/13	HG	GP	read SoCalGas reply to protests	0.25	2013
11/5/13	HG	Close	draft data requests to SoCalGas	0.50	2013
11/12/13	HG	Close	finish drafting DR 1; send to SoCalGas	2.00	2013
11/12/13	HG	Sett	discuss coordination for SoCalGas sett conf w/ other intervenors (CforAT, GL, ORA)	0.50	2013
11/14/13	HG	Sett	discuss sett conf issues w/ Tom Long	0.25	2013
11/20/13	HG	Sett	review Sett proposal from SoCalGas	0.25	2013
11/20/13	HG	Sett	attend mtg w/ other consumer gps (ORA, CforAT, GL) in prep for tomorrow's sett conference w/ SoCalGas	1.00	2013
11/21/13	HG	Sett	attend sett conf w/ SoCalGas	1.75	2013
11/22/13	HG	GP	talk to Stephanie Chen/GL about SoCalGas application, schedule issues	0.50	2013
11/25/13	HG	GP	conf call with all parties to discuss schedule in advance of PHC	1.00	2013
12/2/13	HG	Close	read UWUA protest of SoCalGas CARE forms AL re in person CARE enrollment at branch offices	0.25	2013
12/2/13	HG	GP	talk to Bill Julian re PHC, unions' theory of the case	0.25	2013

TURN Hours Associated with A.13-09-010

Date	Atty	Task	Description	Time Spent	Year
12/3/13	HG	GP	prep for PHC	0.25	2013
12/3/13	HG	GP	attend PHC	0.50	2013
12/12/13	HG	GP	discuss UWUA motion to dismiss w/ CforAT, GL	0.25	2013
12/18/13	HG	GP	read SoCalGas response to UWUA mot d/m	0.25	2013
12/19/13	HG	Comp	start drafting NOI	0.25	2013
12/20/13	HG	Comp	finish NOI	0.75	2013
1/31/14	HG	Close	analyze SCG DR response, rsch for additional discovery (focus on SLO)	3.00	2014
2/4/14	HG	GP	discuss intervenor testimony and scheduling issues w/ M. Kasnitz/CforAT, and E. Gallardo/GL	0.25	2014
2/5/14	HG	GP	confer internally and with CforAT, GL about dealing with the lack of Scoping Memo, related ruling, and rsch, draft inquiry to ALJ Halligan re same on behalf of TURN, GL, CforAT	1.25	2014
2/6/14	HG	Close	rsch PG&E 2007 GRC, data on San Luis Obispo local office; review ORA discovery to date in this proceeding	1.00	2014
2/6/14	HG	GP	contact Gayatri about possibly being a witness for TURN	0.25	2014
2/7/14	HG	GP	discuss case with Gayatri; potential scope of work	0.50	2014
2/12/14	HG	GP	confirm with Gayatri that she'll work on this case; provide her case file and discuss contents	0.75	2014
2/13/14	HG	Close	go through notes and start drafting next DR for SoCalGas	2.75	2014
2/13/14	HG	Close	start rsch for DR 1 to UWUA	0.25	2014
2/14/14	HG	Close	draft DR #1 to UWUA; revise DR #2 to SCG w/ more rsch, input from Gayatri	2.00	2014
2/14/14	HG	Close	finalize DRs and send to UWUA, SCG	0.25	2014
2/25/14	HG	GP	discuss potential for joint testimony with M. Kasnitz/CforAT	0.25	2014
3/3/14	HG	Close	check in with UWUA about TURN DR 1 due today	0.25	2014
3/3/14	HG	Close	read SoCalGas response to TURN DR 2	0.50	2014
3/4/14	HG	Close	talk to Bill Julian/UWUA re work-sharing issue; BO customer surveys	0.50	2014
3/4/14	HG	Close	analysis of impacts of closure on specific BO using TURN DR 1, 2 responses	2.50	2014
3/4/14	HG	Close	exchange hypotheses with Gayatri; plan for further analysis and writing	0.50	2014
3/5/14	HG	Close	review Gayatri's analysis of BO txn data	0.25	2014
3/7/14	HG	Close	review DR responses from UWUA	0.25	2014
3/7/14	HG	GP	read Scoping Memo	0.25	2014

TURN Hours Associated with A.13-09-010

Date	Atty	Task	Description	Time Spent	Year
3/18/14	HG	Close	contact UWUA about customer surveys they have been conducting; confer with Gayatri re same	0.50	2014
3/25/14	HG	#	begin work on my sections of testimony	3.25	2014
3/26/14	HG	#	continue work on testimony	6.50	2014
3/27/14	HG	#	discuss testimony with Gayatri	0.75	2014
3/27/14	HG	#	continue drafting, editing testimony	10.50	2014
3/27/14	HG	Close	discuss testimony with M. Kasnitz/CforAT, E. Gallardo/GLI	0.25	2014
3/28/14	HG	#	incorporate edits from Gayatri, M. Kasnitz/CforAT into draft testimony; finish drafting; and finalize	5.00	2014
3/31/14	HG	GP	confer w/ Gayatri on schedule, next steps	0.25	2014
4/11/14	HG	Close	review UWUA DR 1 (forwarded by B. Julian) [value of BOs]	0.25	2014
4/11/14	HG	Close	rsch to begin drafting next TURN DR about APL service quality	0.50	2014
4/21/14	HG	Close	BOC	0.50	2014
4/21/14	HG	GP	read ORA testimony	0.25	2014
4/23/14	HG	Close	edits to APL DR with Melissa's input, and finalize for service to SCG	0.25	2014
4/24/14	HG	Close	review M. Kasnitz's draft DR on call center impacts from BO closures and discuss how to proceed on add'l call center discovery and rebuttal testimony	0.50	2014
4/24/14	HG	Close	read memo fm M. Kasnitz re add'l info about APLs in SLO and implications for rebuttal testimony	0.25	2014
4/27/14	HG	Close	review CforAT rebuttal testimony re txn volume at APLs, call center wait times and cell phone minutes	0.50	2014
4/28/14	HG	Close	provide edits to M. Kasntiz and add TURN as a sponsor of Belser testimony	0.50	2014
4/28/14	HG	Close	discuss joining CforAT rebuttal testimony with Gayatri	0.25	2014
4/28/14	HG	GP	begin review of SoCalGas rebuttal testimony	0.50	2014
4/29/14	HG	#	discuss SoCalGas rebuttal testimony with Gayatri via email	0.25	2014
4/30/14	HG	GH	confer with SoCalGas, CforAT, GL re evidentiary hrgs	0.25	2014
5/2/14	HG	Close	discuss further discovery on call center impacts with M. Kasnitz/CforAT	0.25	2014
5/2/14	HG	GP	continue reviewing SoCalGas rebuttal testimony	1.00	2014
5/5/14	HG	Close	review CforAT draft DR re call ctr impacts, email M. Kasniz re same	0.25	2014
5/5/14	HG	GH	attend pre-EH conf call with all parties	0.50	2014
5/6/14	HG	Close	read transcript from Palm Springs PPH	0.25	2014

TURN Hours Associated with A.13-09-010

Date	Atty	Task	Description	Time Spent	Year
5/6/14	HG	Sett	review TURN testimony, analysis, and draft memos to Gayatri and CforAT/GL re sett possibility	1.00	2014
5/7/14	HG	Close	review SoCalGas response to TURN DR 3 re impacts on APLs of BO closures and read memo from Gayatri re same	0.25	2014
5/7/14	HG	Sett	call with UWUA, ORA, CforAT, GL re sett possibility	0.75	2014
5/7/14	HG	Sett	review data about particular BO s in prep for intervenor call re sett possibility	0.50	2014
5/8/14	HG	Sett	discuss possibility of sett w/ Bill Julian/UWUA	0.50	2014
5/9/14	HG	GH	review SCG pre-EH docs and send my input	0.25	2014
5/9/14	HG	Sett	discuss possibility of sett w/ ORA, CforAT, GL	0.25	2014
5/12/14	HG	GH	draft email to Gayatri updating her on next steps re sett/hrgs and discussing prep for cross	0.25	2014
5/12/14	HG	Sett	read email fm UWUA about sett prospects, discuss same with other intervenors, and draft email to SoCalGas re hearings	0.50	2014
5/15/14	HG	Close	review Gayatri's suggestions for cross, cross-exhibit re capacity of APLs to assume volume of closed BOs	0.50	2014
5/20/14	HG	Close	call with M. Kasnitz re lines of cross (reasonable alternatives, disparate impact issues)	0.50	2014
5/20/14	HG	GH	talk to B. Julian about rescheduling hearings due to witness medical issues	0.50	2014
5/21/14	HG	GH	discuss potential new dates for EH with parties	0.25	2014
5/22/14	HG	GH	draft e-mail to parties re scheduling issues for new hearing date (per ALJ email); discuss issues with new hearing schedule with K. Hassan/SCG	0.50	2014
5/22/14	HG	Sett	rsch CA Rule of Prof Resp and draft email to K. Hassan/SCG seeking consent to respond to email from G. Wright; with consent, reply to G. Wright	0.50	2014
6/4/14	HG	GH	call from B Julian to discuss hearings issues	0.25	2014
6/5/14	HG	GH	another call from B. Julian to discuss hearings issues	0.25	2014
6/9/14	HG	#	prep for my own cross	0.75	2014
6/9/14	HG	#	prep for cross of Baldwin	8.75	2014
6/9/14	HG	GH	talk to M. Kasnitz about defending my cross	0.50	2014
6/10/14	HG	#	finish prep for my own cross	1.00	2014
6/10/14	HG	#	finish prep for cross of Baldwin	0.50	2014
6/10/14	HG	GH	reivew EH transcript from today (TURN's cross, and SoCalGas cross of me)	0.50	2014
6/10/14	HG	GH	confer with M. Kasnitz after today's EH	0.25	2014

TURN Hours Associated with A.13-09-010

Date	Atty	Task	Description	Time Spent	Year
6/10/14	HG	GH	attend EH	5.75	2014
6/27/14	HG	GP	email M. Kasnitz re surrebuttal, proceeding schedule	0.25	2014
7/9/14	HG	GP	review SoCalGas surrebuttal with discovery in mind; review CforAT DR 2 re same	0.25	2014
7/16/14	HG	GP	conf call w/ consumer gps re briefing outline, schedule	0.75	2014
7/16/14	HG	GP	conf call with SoCalGas and all parties re briefing outline, schedule	0.25	2014
7/31/14	HG	#	review briefing outline, begin brainstorming arguments, organization	0.50	2014
7/31/14	HG	#	call with M. Kasnitz re jointly drafting the brief	0.50	2014
8/1/14	HG	Close	work on SOR portion of brief	0.50	2014
8/2/14	HG	Close	work on SOR portion of brief	0.50	2014
8/2/14	HG	Future	work on brief (future requests)	0.25	2014
8/3/14	HG	BOOP	work on brief (branch office opt process)	2.00	2014
8/4/14	HG	BOOP	continue rsch, drafting brief (opt process)	10.25	2014
8/5/14	HG	#	call with Melissa to discuss brief review, integration, and a few substantive issues	0.75	2014
8/5/14	HG	#	review Melissa's draft, provide edits	1.00	2014
8/5/14	HG	BOOP	review Melissa's suggested edits to my BOOP draft, incorporate	1.00	2014
8/5/14	HG	BOOP	finish rsch, drafting BOOP argument	2.00	2014
8/5/14	HG	Close	rsch, review standard of review argument	1.50	2014
8/5/14	HG	Close	more resch for expanding SOR argument	0.50	2014
8/5/14	HG	Close	draft ratemaking argument	0.75	2014
8/6/14	HG	#	receive integrated draft from Melissa, further review, and finish	3.00	2014
8/6/14	HG	GP	begin reading op briefs of other parties	0.50	2014
8/7/14	HG	#	call with B. Julian (UWUA) re reply brief	0.25	2014
8/7/14	HG	#	draft memo to M. Kasnitz re issue spotting, proposed arguments for reply brief	0.75	2014
8/7/14	HG	GP	finish reading SoCalGas op brief, notes for reply	0.50	2014
8/8/14	HG	#	call with M. Kasnitz to discuss division of issues, workplan for reply brief	0.50	2014
8/8/14	HG	#	draft email to B. Julian (UWUA) re issues for reply brief that TURN/CforAT will not be addressing	0.25	2014
8/17/14	HG	#	begin work on reply brief	0.25	2014
8/19/14	HG	#	work on reply brief (LI screen, non-pay txns, FACTA)	4.25	2014
8/19/14	HG	#	review Melissa's draft, integrate document	0.75	2014
8/20/14	HG	#	draft intro, incorporate edits from Melissa to all sections	0.50	2014

TURN Hours Associated with A.13-09-010

Date	Atty	Task	Description	Time Spent	Year
8/20/14	HG	Close	rsch prior CPUC decisions related to SCE office closures; draft response to SoCalGas comparison to SCE	2.50	2014
12/15/15	HG	PD	begin reading PD	0.50	2015
12/16/15	HG	PD	continue analysis of PD in prep for cmts	0.50	2015
12/17/15	HG	PD	confer with M. Kasnitz/CforAT re possible collaboration on cmts on PD	0.25	2015
12/17/15	HG	PD	more work reviewing PD & record, drafting notes for cmts	2.50	2015
12/22/15	HG	PD	review notes, consider strategy, and confer with M. Kasnitz re cmts on PD & SoCalGas upcoming motion to supplement the record	1.25	2015
12/22/15	HG	PD	review record for cmts on PD	1.50	2015
1/4/16	HG	Close	call with M. Kasnitz re response to SCG mot'n to supp record	0.50	2016
1/5/16	HG	Close	draft response to SCG motion to supp record	3.75	2016
1/5/16	HG	Close	incorporate edits from CforAT to response to motion	0.25	2016
2/22/16	HG	Close	read ALJ ruling granting motn to supp record and soliciting cmts on supp testimonies (SCG, UWUA), and discuss cmts with M. Kasnitz	0.25	2016
3/1/16	HG	Close	draft cmts on supplemental testimony per 2/22/16 ALJ Ruling	1.00	2016
3/2/16	HG	Close	finish drafting cmts on supp testimony, and incorporate edits from M. Kasnitz/CforAT re same	1.25	2016
3/10/16	HG	Close	confer with M. Kasnitz re reply cmts on SCG supp testimony, and review her draft	0.25	2016
5/23/16	HG	PD	review re-issued PD, focus on changes	0.25	2016
6/10/16	HG	PD	review notes on initial PD, confer with M. Kasnitz re op cmts	0.50	2016
6/14/16	HG	PD	read op cmts on PD	0.25	2016
08/19/16	HG	Comp	begin work on comp request	0.25	2016
08/22/16	HG	Comp	work on comp request	0.50	2016
08/23/16	HG	Comp	work on comp request	2.00	2016
08/24/16	HG	Comp	work on comp request	2.50	2016
08/25/16	HG	Comp	more work on comp request	5.50	2016
	HG Total			163.75	
2/7/14	JBS-G Schilberg	GP	TURN Socal Gas office closures -talk with Hayley	0.22	2014
2/12/14	JBS-G Schilberg	GP	review filings	2.03	2014
2/13/14	JBS-G Schilberg	Close	create DR on office closings	0.86	2014
2/14/14	JBS-G Schilberg	Close	create DR on office closings	2.55	2014

TURN Hours Associated with A.13-09-010

Date	Atty	Task	Description	Time Spent	Year
3/4/14	JBS-G Schilberg	Close	read responses to DR 2; create outline of issues	3.32	2014
3/5/14	JBS-G Schilberg	#	research issues; create testimony outline	3.64	2014
3/6/14	JBS-G Schilberg	#	write draft	2.00	2014
3/17/14	JBS-G Schilberg	#	write testimony; read DRs	1.05	2014
3/18/14	JBS-G Schilberg	#	write testimony	2.40	2014
3/19/14	JBS-G Schilberg	#	write testimony	0.46	2014
3/20/14	JBS-G Schilberg	#	write testimony	2.74	2014
3/21/14	JBS-G Schilberg	#	write testimony	2.18	2014
3/27/14	JBS-G Schilberg	#	talk over draft with Hayley	0.83	2014
3/28/14	JBS-G Schilberg	#	edit testimony draft	1.14	2014
3/31/14	JBS-G Schilberg	GP	review testimony by other intervenors	2.38	2014
4/11/14	JBS-G Schilberg	Close	read UWUA DR to SCG	0.07	2014
4/28/14	JBS-G Schilberg	GP	review rebuttal testimony	0.31	2014
4/29/14	JBS-G Schilberg	GP	read rebuttal	0.75	2014
5/12/14	JBS-G Schilberg	Close	review PPH; prepare cross	1.13	2014
5/13/14	JBS-G Schilberg	Close	write cross for Baldwin	2.19	2014
5/14/14	JBS-G Schilberg	Close	prepare exhibit for Baldwin	0.32	2014
6/13/14	JBS-G Schilberg	GH	review transcript	0.27	2014
	JBS-G Schilberg Total			32.84	
11/14/13	TL	Sett	Discuss settlement issues w/Hayley	0.25	2013
	TL Total			0.25	
	Grand Total			197.09	

Revised September 2014

Attachment 3

Expense Detail

Date	Task	Description	Amount
<u>Activity: \$Copies</u>			
10/18/13	\$Copies	Copies to send Protest of The Utility Reform Network to ALJ and Commissioner.	\$1.00
12/20/13	\$Copies	Copies of NOI sent to ALJ and Commissioner.	\$1.60
3/28/14	\$Copies	Copies of Testimony of JBS Consultant Gayatri Schilberg and Hayley Goodson sent to ALJ and Commissioner.	\$13.00
6/9/14	\$Copies	Copies of TURN exhibits for evidentiary hearings (699 copies)	\$69.90
8/6/14	\$Copies	Copies of Joint Opening Brief of TURN/CforAT sent to ALJ.	\$4.90
8/21/14	\$Copies	Copies of Joint Reply Brief of TURN/CforAT sent to ALJ.	\$1.00
1/6/16	\$Copies	Copy of Response of TURN and CforAT to the Motion of Southern California Gas Company to Supplement the Record to send to ALJ - 8 pages at \$0.10 per page	\$0.80
3/4/16	\$Copies	Copy of Comments of TURN and CForAT on the supplemental testimony admitted into the record on February 22, 2016 to send to the ALJ - 8 pages at \$0.10 per page	\$0.80
Total: \$Copies			\$93.00
<u>Activity: \$Lexis Research</u>			
11/30/13	\$Lexis Research	LexisNexis November 2013 Invoice	\$15.70
8/31/14	\$Lexis Research	LexisNexis August 2014 Invoice	\$91.34
Total: \$Lexis Research			\$107.04
<u>Activity: \$Phone</u>			
11/30/13	\$Phone	Telepacific Invoice 11/30/2013	\$1.61
12/31/13	\$Phone	Telepacific Invoice 12/31/13	\$0.60
3/31/14	\$Phone	Telepacific Invoice 3/31/14	\$4.02
5/31/14	\$Phone	Telepacific Invoice 5/31/14	\$0.47
6/30/14	\$Phone	Telepacific Invoice 6/30/14	\$0.57
7/31/14	\$Phone	Telepacific Invoice 7/31/14	\$1.95
8/31/14	\$Phone	Telepacific Invoice 8/31/14	\$0.58
6/30/15	\$Phone	7/31/2015 Phone Bill	\$0.02
Total: \$Phone			\$9.82
<u>Activity: \$Postage</u>			
10/18/13	\$Postage	Postage to send Protest of The Utility Reform Network to ALJ and Commissioner.	\$2.24
12/20/13	\$Postage	Postage for NOI sent to ALJ and Commissioner.	\$2.24
3/28/14	\$Postage	Postage for Testimony of JBS Consultant Gayatri Schilberg and Hayley Goodson sent to ALJ and Commissioner.	\$4.06
8/6/14	\$Postage	Postage for Joint Opening Brief of TURN/CforAT sent to ALJ.	\$1.82
8/21/14	\$Postage	Postage for Joint Reply Brief of TURN/CforAT sent to ALJ.	\$1.19
1/6/16	\$Postage	Postage to mail Response of TURN and CforAT to the Motion of Southern California Gas Company to Supplement the Record to the ALJ	\$1.20
3/4/16	\$Postage	Postage to mail Comments of TURN and CforAT on the supplemental testimony admitted into the record on 2/22/2016	\$1.20
Total: \$Postage			\$13.95
Grand Total			\$223.81



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31-AUG-14

112Z08

BILLING PERIOD 01-AUG-14 - 31-AUG-14

INVOICE TO:
UTILITY REFORM NETWORK
SAN FRANCISCO CA 94102

ITEMIZATION OF LEXISNEXIS & RELATED CHARGES
ACCOUNT SUMMARY BY CLIENT

CLIENT

A13-09-010
GENERAL COMP -- NON-COMPENSABLE
GENERAL WORK
I1310003
PG&E 2015 GT&S A13-12-012
SCE 2015 GRC A1311003
ACCOUNT TOTAL:

CONTRACT USE			TRANSACTIONAL USE				
GROSS AMOUNT	ADJUSTMENT	NET AMOUNT	OVER THE CAP	OUTSIDE CONTRACT	TOTAL BEFORE TAX	TAX	TOTAL CHARGES
\$ 615.00	(\$ 523.66)	\$ 91.34	-	-	\$ 91.34	-	\$ 91.34
\$ 123.00	(\$ 104.73)	\$ 18.27	-	-	\$ 18.27	-	\$ 18.27
\$ 779.00	(\$ 663.29)	\$ 115.71	-	-	\$ 115.71	-	\$ 115.71
\$ 20.00	(\$ 17.03)	\$ 2.97	-	-	\$ 2.97	-	\$ 2.97
\$ 328.00	(\$ 279.29)	\$ 48.71	-	-	\$ 48.71	-	\$ 48.71
-	-	\$ 0.00	-	-	\$ 0.00	-	\$ 0.00
\$ 1,865.00	(\$ 1,588.00)	\$ 277.00	\$ 0.00	\$ 0.00	\$ 277.00	\$ 0.00	\$ 277.00

Revised September 2014

Attachment 4

TURN Hours Allocated by Issue

TURN Request for Compensation in A.13-09-010

Attachment 4: Time Allocation by Issue

Advocate	Activity Code (hours)									
	#*	BOOP	Close	Comp	Future	GH	GP	PD	Sett	Total
Hayley Goodson, TURN Attorney	50.50	15.25	37.25	11.75	0.25	10.00	23.50	7.50	7.75	163.75
Robert Finkelstein, TURN General Counsel						0.25				0.25
Thomas J. Long, TURN Legal Director									0.25	0.25
Gayatri Schilberg, JBS Energy	16.44		10.44			0.27	5.69			32.84
Total Hours	66.94	15.25	47.69	11.75	0.25	10.52	29.19	7.50	8.00	197.09
% of Grand Total Hours	34.0%	7.7%	24.2%	6.0%	0.1%	5.3%	14.8%	3.8%	4.1%	100.0%
<i>with "#" allocation</i>		21.3%	41.2%	6.0%	3.5%	5.3%	14.8%	3.8%	4.1%	100.0%

*Time coded "#" can be allocated across "Close", "BOOP", and "Future" approximately as follows: 50% to Close, 40% to BOOP, and 10% to Future.